

Tucson Iron & Metal

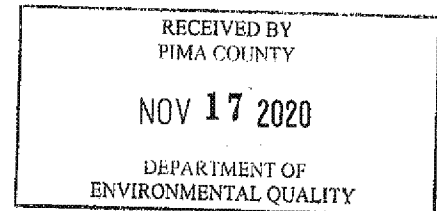
Custom Incineration

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November 17, 2020

Ms. Jackie Ronstadt
Air Compliance Manager
Pima County Department of Environmental Quality
33 N. Stone Avenue, Suite 700,
Tucson, AZ 85701



Tucson Iron and Metal, Inc. (TIM)
PDEQ Air Permit No. 127 / NSPS EEEE
TIM Notice of Violation #127-0009T Response
Tucson, Pima County, Arizona

Dear Ms. Ronstadt:

Tucson Iron & Metal (TIM) is providing response to the Pima County Department of Environmental Quality (PDEQ) regarding the Notice of Violation #127-0009T. Alleged violations regarding the Other Solid Waste Incineration (OSWI) unit were based upon a review of the October 30, 2020, Bison Engineering, Inc. performance test conducted September 9-10, 2020, and review of TIM excess emissions reporting.

Alleged Violation #1: TIM conducted an annual performance test of the OSWI unit on September 9 & 10, 2020, with a test results report issued on October 30, 2020, that specified the unit failed to demonstrate compliance with the dioxin/furan (D/F) emission limitation of 33 nanograms per dry std cubic meter (ng/dscm) @7%O₂. The D/F test result average was 132 ng/dscm@7%O₂.

Requested Corrective Actions: PDEQ requested TIM conduct a retest within 30 days of the November 10 NOV for the failed D/F test to demonstrate compliance. Provide written notification to PDEQ in advance of the performance test. Also, provide justification for correcting the reported D/F emissions (diverting from the Method 23 Total Basis) using the 2005 WHO TEF emission factors in your emission calculations.

TIM Corrective Action:

TIM has scheduled a retest for D/F from the OSWI unit, to be conducted by Bison Engineering, Inc. (Bison) on November 24, 2020. TIM requests this scheduled corrective action should serve as advance notice to PDEQ as an appropriate notice of the pending stack test for D/F from the OSWI unit (since less than 14 days advance notice). The Drug Enforcement Agency (DEA) and the U.S. Customs and Border Protection (C&BP) service, accumulate contraband inventory in anticipation of delivering contraband for a burn at the TIM OSWI unit. The November 24 date is the earliest coordinated date that Bison and the federal law enforcement agency could schedule a burn in the OSWI unit.

TIM asked Bison to provide justification for correcting the reported D/F emissions (diverting from the Method 23 Total Basis) using the 2005 WHO TEF emission factors in the Bison stack test report emission calculations. Bison responded that it is standard practice to correct Method 23 results using the 2005 WHO TEF emission factors, and that this question seems unusual coming from a regulatory agency. Bison contacted the lab who performed the D/F analysis, and the lab also confirmed it was standard practice.

Bison checked EPA Method 23 and it doesn't reference anything about making those corrections using the TEF emission factors. Bison has emailed Raymon Merrill, the EPA expert on Method 23, to get his explanation on why it is industry standard to use WHO TEF emission factors for reporting results and not on a total basis. Bison will provide additional information once they receive a response from Raymon Merrill.

Alleged Violation #2: During the September 2020 stack test TIM failed the D/F emission limitation and failed to report the excess emission to PDEQ. Excess emissions must be reported to PDEQ within 24 hours of the excess emission by phone or email and a detailed report must be submitted to PDEQ within 72 hours of the notification.

Requested Corrective Actions: Provide a detailed written report and corrective actions to correct the excess emission and prevent it from occurring in the future. The report shall contain the location of the emission point; the magnitude of the emission; the date, time and duration of the excess emission; identify the equipment the emission emanated from, the nature and cause of the emissions, and the steps that were taken or are being taken to limit the excess emission.

TIM Corrective Action:

The emission point location is the OSWI unit exhaust stack, EPN 1, a facility located at 4484 E. Tennessee Street, Tucson, Arizona. The emission reported in the Bison Stack Test Report was 132 ng/dscm which exceeded the emission limit of 33 ng/dscm on September 9, 2020. It should be noted that the grab samples for the D/F test was processed by a laboratory on the west coast that had delay in sample processing due to forest fires in its area. The D/F emission result was received by TIM about October 30, 2020.

The primary corrective action that TIM is taking to correct the excess D/F emission is to investigate the cause of the emission. It is still unclear to TIM what caused the excess emissions, after so many consecutive successful tests at approximately 4% of the D/F emission limit.

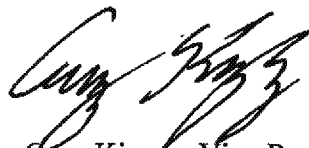
Since TIM does not have control of what happens to the samples once taken, TIM cannot further investigate the possibility that the samples were contaminated after being taken. Bison says it is highly unlikely that this is the cause of the excess emissions, but it still seems like a possible cause to TIM, given the strong consistency TIM has shown in this test in previous years. Bison agrees that the results on the D/F test performed in September 2020 are highly suspect because they vary so much from previous results.

TIM has also considered that the temperature of the OSWI unit may have been too low when the D/F was tested. While this may have been true for the first run, it was not true for the 2nd and 3rd run, so it is not clear that this was the cause of the excess emission. Nonetheless, TIM

is taking steps to ensure that contraband is only fed when the afterburner is at compliant temperature, including re-training of the OSWI unit operator, and starting up the incinerator earlier to allow it to come to temperature before contraband is fed in.

An advance written notice of the stack testing schedule is being provided to PDEQ in this response to the recent NOV. The test protocol has not changed and is the same as that provided PDEQ for previous stack tests. If you have any questions or require additional information, please contact me at 520-884-1554.

Sincerely,



Gary Kippur, Vice President

cc: Mr. Matt Salazar, Manager
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